

M-15389 US

REMARKS

Claims 1-23 are pending in the present application. Claims 1-3, 5-19, and 21-23 are rejected under 35 U.S.C. 103(a). Claims 4 and 20 have allowable subject matter. The rejections are respectfully traversed in light of the following remarks, and reconsideration is requested.

Rejections under 35 U.S.C. § 103(a)

Claims 1-3, 5-11, 13-15, 17-19, 21, and 23 were rejected under 35 U.S.C. 103(a) as being unpatentable over Hampton (U.S. Pat. No. 6,819,256) in view of Luper (U.S. Pat. No. 6,011,461). In rejecting claims 1, 15, and 18, the Examiner states, in part, that "Hampton fails to specifically disclose . . . wherein the microcontroller is operable to . . . compare the first and second location coordinates and cause the display to indicate information directing the user from the second location to the first location. In related art, Luper discloses a portable system wherein it . . . compares the first and second location (See col. 2, lines 28-41; abstract; col. 5, lines 54-67-col. 6, lines 1-15)."

As stated by the Examiner, Hampton discloses a portable device comprising a keypad, a microcontroller coupled to the keypad, and a display coupled to the microcontroller. Hampton discloses that the portable device is for providing the user with a reminder message. (See Abstract). The reminder message is to remind the user "to do something that needs to be done, such as an errand or attending a meeting and the like." (Col. 1, lines 15-18).

Luper discloses a system which determines if a speed sensor, such as a speedometer, is faulty by 1) obtaining an initial position of the vehicle using GPS, 2) obtaining the current vehicle speed at the end of a specific time period using the vehicle speed sensor, 3) obtaining a final position of the vehicle at the end of the specific time period using GPS, 4) calculating the distance traveled by the vehicle using the speed and time, 5) calculating the distance

MACPHERSON KIVOK CHEN  
& BEID LLP2033 GATEWAY PLACE  
SUITE 400  
SAN JOSE, CA 95110  
(408) 322-9250  
FAX (408) 392-9262

M-15389 US

traveled by the vehicle using the difference between the two GPS position measurements, and 6) comparing the two distance calculations to determine the discrepancies between the two, if any. (Luper, col. 1, lines 43-54, col. 5, lines 6-27; Fig. 2 and corresponding text). In other words, Luper takes two GPS positional measurements and calculates the distance between the two. Luper then compares this with a distance calculated using the vehicle's speedometer and elapsed time. Thus, Luper simply calculates the distance between two GPS locations.

The Examiner states that Luper discloses comparing the first and second locations. As discussed above, Applicant believes that Luper discloses comparing a first location calculated using speed and time and a second location calculated using GPS locations.

In contrast, claim 1 recites that a "microcontroller is operable to . . . compare the first and second location coordinates and cause the display to indicate information directing the user from the second location to the first location." Thus, Applicant's invention is directed to first storing the position of a first location, such as of a parked vehicle, determining the location of the user at a second location, and then providing directions to the user to get back to the first location from the second location. This is especially useful to enable the user to easily find and get to the location where the user's car was parked last. This is very different than the device disclosed in Luper. Luper, as discussed above, simply calculates distance traveled. There is nothing in Luper even remotely suggesting using a stored location and a current location to provide direction to the user for getting from the current location to the stored location, as Luper is solely directed to determining speed sensor failure.

Therefore, for the reasons above, claim 1 is patentable over the cited references.

In addition, even assuming arguendo that Luper remedies the deficiencies of Hampton, Applicant contends that Hampton and Luper cannot be properly combined because there is no motivation to combine. The Examiner states that "It would have been obvious to one of ordinary skill in the art . . . to modify the system of Hampton with that of Luper by having a

MACPHERSON KWOK CHEN  
& HEID LLP  
2013 GATEWAY PLACE  
SUITE 400  
SAN JOSE, CA 95110  
(408) 792-9250  
FAX (408) 392-9262

M-15389 US

GPS sensor coupled to the microcontroller in order to perform positional information.”

However, as discussed above, Hampton discloses a device that sends the user reminder messages. There is nothing in Hampton that teaches or suggests using the device to calculate distance traveled or determine speed sensor failure, which is the subject matter of Luper. Thus, there is no motivation to modify Hampton to perform positional information because Hampton simply does not discuss or suggest using the device for any kind of location determination, positional information, or distance traveled.

Independent claim 15 recites that a “microcontroller is operable to . . . compare the first and second location coordinates and direct the display to display a direction from the second location to the first location”.

Independent claim 18 recites “comparing the second location coordinates to the first location coordinates; and displaying a direction arrow to indicate a direction from the second location coordinates to the first location coordinates.”

Thus, for reasons similar to claim 1, claims 15 and 18 are patentable over Hampton in view of Luper.

Claims 2, 3, 5-11, 13, 14, 17, 19, 21, and 23 depend on claims 1, 15, and 18 and are thus patentable over the cited references for at least the same reasons as claims 1, 15, and 18.

Claims 2-3, 5, 12, 16, and 22 were rejected under 35 U.S.C. 103(a) as being unpatentable over Hampton (U.S. Pat. No. 6,819,256) in view of Luper (U.S. Pat. No. 6,011,461) and Boesch et al. (U.S. Pat. No. 6,438,382).

Boesch et al. disclose a device to “expedite position determination”. (Col. 2, line 10). The purpose is to ensure “that a mobile terminal maintains current position assistance data so that the time required to determine its geographic position on demand is reduced.” (Col. 2, lines 63-66). Further, Boesch et al. goes on to state that “The mobile terminal 100 maintains updated position assistance data, which may include GPS satellite position and time

MACPHERSON KWOK CHEN  
& HEID LLP  
2033 GATEWAY PLACE  
SUITE 400  
SAN JOSE, CA 95110  
(408) 322-0750  
FAX (408) 392-9262

M-15389 US

information, so that it can rapidly calculate its geographic position when necessary.” (Col. 3, lines 42-45). Thus, the device maintains and stores updated position information as the device moves so that when a position determination is needed, such as in an emergency calling situation, the mobile terminal can quickly determine the position because of the stored updated position information. (Col. 1, line 61 to col. 2, line 41). In other words, Boesch et al. discloses a device that calculates the location of the user, where the calculation time is reduced because position information is updated by the device.

As set forth in detail in the previous response, Boesch et al. does not teach or suggest the limitations of independent claims 1, 15, or 18. Namely, Boesch et al. discloses simply performing the function of “direct[ing] the GPS sensor to request and receive second location coordinates at a second location when the user presses the second button”, i.e., calculating the location of the user at a present time. There is no disclosure or teaching of other limitations of claim 1, such as comparing a first location to a second location and indicating information to the user of how to get to the first location from the second location. Boesch et al. does not even use the first known location, as it continually updates the current position.

Thus, because Boesch et al. do not remedy the deficiencies of Hampton or Luper, as applied to claims 1, 15, and 18, claims 1, 15, and 18 are patentable over the cited references. As a result, claims 2-3, 5, 12, 16, and 22, which depend on claims 1, 15, and 18, are likewise patentable over the cited references for at least the same reasons.

Accordingly, Applicant respectfully requests reconsideration and withdrawal of the rejections under 35 U.S.C. § 103.

#### Objected to Claims

Claims 4 and 20 were objected to for being dependent upon a rejected base claim.

However, as discussed above, Applicant contends that claim 1, from which claim 4 depends,

M-15389 US

and claim 18, from which claim 20 depends, are allowable. Accordingly, claims 4 and 20 are allowable for at least the same reasons as claims 1 and 18, respectively.

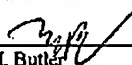
MACPHERSON KWOK CHEN  
& FIED LLP

2033 GATEWAY PLACE  
SUITE 400  
SAN JOSE, CA 95110  
(408) 392-9150  
FAX (408) 392-0263

M-15389 US

CONCLUSION

For the foregoing reasons, Applicant believes pending claims 1-23 are allowable, and a notice of allowance is respectfully requested. If the Examiner has any questions regarding the application, the Examiner is invited to call the undersigned Attorney at (949) 752-7040.

Certification of Facsimile Transmission	
I hereby certify that this paper is being facsimile transmitted to the U.S. Patent and Trademark Office on the date shown below.	
 Monique M. Butler	October 4, 2006 Date of Signature

Respectfully submitted,



Tom Chen

Attorney for Applicant(s)  
Reg. No. 42,406MACPHERSON KWOK CHEN  
& BEID LLP2033 GATEWAY PLACE  
SUITE 400  
SAN JOSE, CA 95110  
(408) 292-9250  
FAX (408) 292-9262